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February 6, 2017

Via ECF

Hon. Ann Marie Donio
United States Magistrate Judge
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza
4th and Cooper Streets, Room 1050
Camden, NJ 08101

Re: *Sevenson Environmental Services, Inc. v. Gordon D. McDonald, et al.*
Civ. Action No. 08-CV-1386 (RMB-AMD)

Dear Judge Donio:

On behalf of defendant Diversified Royalty Corporation (“Diversified”), we write concerning Plaintiff’s Request for International Judicial Assistance (Letters Rogatory) (the “Request”). Consistent with Diversified’s letters submitted on October 21, 2016 (Dkt. No. 363) and December 12, 2016 (Dkt. No. 369), Diversified takes no position on the current form of the Request, but it expressly preserves any objections available to it in any potential proceedings before a Canadian court as to the scope and enforceability of the Request.

There is currently no discovery end date set for the completion of the two depositions contemplated by the Request. Accordingly, Diversified respectfully requests that the Court enter an order requiring Plaintiff to complete the discovery within 90 days of the Court’s approval of the Request.

Respectfully,

A handwritten signature in blue ink that reads 'John Vukelj'. Below the signature, the name 'John Vukelj' is printed in a smaller, sans-serif font.

cc: All parties via ECF